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February 10, 2020

## Via ECF

The Honorable George B. Daniels United Stated District Court Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

RE: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)
Ashton et al. v. al Qaeda et al., 02-cv-6977 (GBD) (SN)
Bauer et al v. al Qaeda Islamic Army et al., 02-cv-7236 (GBD) (SN)
Burlingame. v. Islamic Republic of Iran, 02-cv-7230 (GBD) (SN)
Cheryl Rivelli, et al. v. Islamic Republic of Iran, 18-cv-11878 (GBD) (SN)

## Dear Judge Daniels:

Further to the letter-request submitted with the Court on Friday February 7, 2020 (ECF No. 5880), attached is a proposed Final Order of Judgment for *Ashton, Bauer, Burlingame* and *Rivelli* Plaintiffs set forth on the attached Exhibit A. Magistrate Judge Netburn previously recommended the judgment amounts as listed for the plaintiffs in Exhibit A. See ECF Nos. 5387 at 8 and 5701 at 10.

Judge Netburn combined the recommendations for some of our clients, for whom we had moved separately and for whom we had provided separate proposed Orders. In order to try to simplify our request for an Order adopting Judge Netburn's recommended awards for our clients, while also allowing an extension of time to file any objections to her denials of awards until March 17, 2020, we are providing to the Court a new proposed Final Order of Judgment and Exhibit A that includes all plaintiffs for whom Judge Netburn recommended awards be issued, with the amounts reflecting her recommendations.

Given that the plaintiffs must get any Final Order of Judgment translated to Farsi and served prior to February 19, 2020, we respectfully ask that the Court grant this request at its earliest convenience.

New York Boston Los Angeles

February 10, 2020 Page 2

Respectfully submitted,

KREINDLER & KREINDLER, LLP

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